

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JARED MICHAEL DIEHL,

Defendant.

)
)
)
)
)
)
)
)
)
)

Cause No. 4:22-CR-00055 RLW/PLC

**DEFENDANT'S SECOND MOTION FOR EXTENSION OF TIME
TO FILE PRE-TRIAL MOTIONS**

Comes now Counsel for Defendant, Jared M. Diehl and respectfully requests a forty five-day extension of the filing deadline for pre-trial motions. In support of this motion, Counsel states as follows:

1. Defendant has been charged with one count of Receipt of Child Pornography.
2. Defense Counsel has requested information pertaining to the investigation that is being obtained by the Government. The original investigation came from an overseas operation and the requested information is in the possession of the investigating agency. Counsel anticipates that discovery will be provided soon.
3. The parties have engaged in plea negotiations which may alleviate the need for pretrial motions. More time is needed to complete these negotiations. A draft plea agreement has been requested but has not yet been received. Once received Counsel will meet with Defendant to go over his final options.
4. Counsel has a jury trial this week in the State of Illinois that has taken a significant amount of time to prepare for. Additionally, Counsel has been heavily engaged in *United States v.*

John Collins-Muhammad, 4:22-CR-00297 SRC-JMB, a complex case with voluminous discovery. Based on these cases, and Counsel's other caseload, more time is required.

5. A trial date has not been set for the cause.

6. The Government has no objection to this request for an extension per Assistant United States Attorney Jillian Anderson.

7. This request for an extension of time is made in good faith for all the reasons listed herein and not to vex or harass the Court or the Government, but to ensure Defendant's Sixth Amendment right to effective assistance of counsel. The ends of justice will be best served by excluding these periods of delay from calculating deadlines that would otherwise apply. 18 U.S.C. §3161(h)(7)(A) and (B)(iv).

WHEREFORE, for the foregoing reasons Counsel for Defendant requests a forty five-day extension of the deadline to file pre-trial motions.

Respectfully submitted,

FRANK, JUENGEL & RADEFELD,
ATTORNEYS AT LAW, P.C.

By /s/ Joseph W. Flees
JOSEPH W. FLEES (#60872MO)
Co-Counsel for Defendant
7710 Carondelet Avenue, Suite 350
Clayton, Missouri 63105
(314) 725-7777
jflees@fjrdefense.com

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Jillian Anderson
Asst. United States Attorney
111 South Tenth Street, 20th Floor
St. Louis, Missouri, 63102

/s/ Joseph W. Flees
JOSEPH W. FLEES